

# **EXHIBIT A-1**

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

SECURITYSCORECARD, INC.,

Plaintiff,

-against-

SAFE SECURITIES, INC. d/b/a SAFE  
SECURITY; *et al.*,

Defendants.

Case No. 24-cv-04240-ER

**STIPULATION AND  
[PROPOSED] ORDER**

THIS MATTER, having been opened to the Court by Plaintiff SecurityScorecard, Inc.’s (“SSC”) Proposed Order to Show Cause dated July 26, 2024;

WHEREAS, on July 29, 2024, this Court entered an Order to Show Cause why a preliminary injunction should not issue and scheduled a hearing for August 13, 2024;

WHEREAS, on August 12, 2024, SSC and Defendant SAFE Securities, Inc. (“SAFE”) submitted a Stipulation and Proposed Order providing that SAFE, and all persons acting in concert with SAFE, shall not access the SSC customer platform during the pendency of this case; SSC shall provide SAFE forensically sound current versions of all “digital footprint” documents and “work product templates”; and SAFE shall undertake a good faith effort to locate and sequester during the pendency of this case any such materials (Dkt. No. 97);

WHEREAS, on August 12, 2024, SSC submitted a revised proposed order pertaining to its request for injunctive relief (Dkt. No. 98);

WHEREAS, on August 13, 2024, the Court conducted a hearing on SSC’s Renewed OSC, and at the hearing directed SSC and SAFE to submit an amended stipulation and order after conferring;

WHEREAS, counsel for the parties have so conferred;

**IT IS HEREBY ORDERED**, that pending further Order of this Court and for the duration of these proceedings: SAFE, and all persons acting in concert with or through SAFE who receive actual notice of the Order, are enjoined from disclosing or using any digital footprints and questionnaire templates obtained from SSC's customer platform.

[signature page follows]

SO STIPULATED AND AGREED.

**PILLSBURY WINTHROP SHAW  
PITTMAN LLP**

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*Attorneys for Defendant Safe  
Securities, Inc. d/b/a Safe Security*

IT IS SO STIPULATED AND ORDERED, this \_\_\_\_\_ day of August, 2024.

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HON. EDGARDO RAMOS, U.S.D.J.